

AO 91 (Rev. 02/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
District of Oregon

FILED 30 DEC '14 11:15 USDC-ORP

United States of America  
v.  
ANDRE EUGENE SHAW

Case No.

'14-MJ-183

*Defendant*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 12/18/2014 in the county of Multnomah in the \_\_\_\_\_ District of  
Oregon, the defendant violated 18 U. S. C. § 1028(a)(1) and (3), & 26 USC 5861(d)  
, an offense described as follows:

18 USC 1028(a)(1) -- knowingly and without lawful authority producing a false identification document;

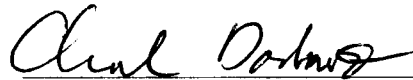
18 USC 1028(a)(3) -- knowingly possessing with intent to use unlawfully five or more false identification documents; and

26 USC 5861(d) -- knowingly possessing firearms, namely four silencers, that are not registered to him in the National  
Firearms Registration and Transfer Record.

This criminal complaint is based on these facts:

See the attached affidavit of Special Agent Charles Dodsworth, Federal Bureau of Investigation, incorporated herein.

☒ Continued on the attached sheet.



*Complainant's signature*

Charles Dodsworth, Special Agent, FBI

*Printed name and title*

Sworn to before me and signed in my presence.

Date: December 30, 2014



*Judge's signature*

City and state: Portland, Oregon

Honorable John Jelderks, U.S. Magistrate Judge

*Printed name and title*

I, Charles Dodsworth, having been first duly sworn, do hereby depose and state as follows:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been so employed since July 2002. I am currently assigned to the Portland Division of the FBI where I investigate computer-related crimes. I have received training in the investigation of computer, telecommunications, and other technology crimes. Since April 2007, I have been involved in the investigation of matters involving the sexual exploitation of children, including the online sexual exploitation of children, particularly as it relates to violations of Title 18, United States Code (U.S.C.), Sections 2252A and 2422. I am part of the Portland Violent Crimes Against Children (VCAC) Task Force, which includes other FBI Special Agents, a Hillsboro Police Department Detective, and a Portland Police Bureau Detective. VCAC is an intelligence-driven, proactive, multi-agency investigative initiative to combat the proliferation of child pornography/child sexual exploitation facilitated by an online computer. As a member of this task force, I have received training and certification at the FBI Calverton Resident Agency in areas related to online computer crime investigation involving child pornography and other aspects of child exploitation.

2. This affidavit is submitted in support of a criminal complaint charging Andre Eugene Shaw, a black male born XX/XX/1984, with knowingly and without lawful authority

producing a false identification document, in violation of 18 U.S.C. § 1028(a)(1); knowingly possessing with intent to use unlawfully five or more false identification documents, in violation of 18 U.S.C. § 1028(a)(3); and possessing four unregistered firearm silencers, in violation of 26 U.S.C. § 5861(d).

3. The statements contained in this affidavit are based upon the following: my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; interviews of witnesses; my review of records related to this investigation; communications with others who have knowledge of the events and circumstances described herein; and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint, it does not set forth each and every fact that I or others have learned during the course of this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that Andre Eugene Shaw has violated 18 U.S.C. §§ 1028 (a)(1) and (a)(3), and 26 U.S.C. § 5861(d).

#### **APPLICABLE LAW**

4. 18 U.S.C. § 1028(a)(1) makes it unlawful to knowingly and without lawful authority produce an identification document or a false identification document. Section 1028(a)(3) makes it unlawful to knowingly possess with intent to use unlawfully five or more false identification documents.

5. 26 U.S.C. § 5861(d) makes it unlawful for a person to receive or possess a firearm which is not registered to him in the National Firearms Registration and Transfer Record. Under 26 U.S.C. § 5845(a)(7), the term “firearm” includes “any silencer” as defined in 18 U.S.C. § 921.

Section 921(a)(24) defines a “silencer” as “any device for silencing, muffling, or diminishing the report of a portable firearm.”

**STATEMENT OF PROBABLE CAUSE**

6. On December 17, 2014, U.S. Magistrate Judge John V. Acosta signed a search warrant in case number 14-MC-520, authorizing searches of the person of Andre Eugene Shaw and his residence, located at 1411 SE 179th Avenue, Portland, OR 97233, for contraband and evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 2251(a), involving the production of child pornography and conspiracy to produce child pornography; 18 U.S.C. § 2251A, involving the buying or selling of children for the purpose of producing child pornography and conspiracy to commit those crimes; 18 U.S.C. § 2252A, involving the transportation, distribution, and possession of child pornography; 18 U.S.C. § 873, involving blackmail; 18 U.S.C. § 875, involving the interstate communication of threats; 18 U.S.C. § 880, involving receipt of the proceeds of extortion; 18 U.S.C. § 1030, involving fraud and related activity in connection with computers; and 18 U.S.C. § 1028, involving fraud and related activity in connection with identification documents. The warrant authorized searches for, and the seizure of, contraband and evidence, fruits, and instrumentalities of those offenses.

7. On December 18, 2014, FBI Agents and Task Force Officers and officers of the Portland Police Bureau executed the aforementioned search warrant on the person of Andre Shaw and at his residence. During the search of Shaw’s residence, agents and officers located and seized a substantial amount of evidence pertaining to the production and possession of false identification documents, including the following:

a. Eight Oregon driver’s licenses, all with the same photograph of Andre Shaw, but displaying five different Oregon driver’s license numbers, eight different names, and

eight different addresses. A Law Enforcement Database System (LEDS) check indicated those driver's license numbers were either invalid or were issued in a different name.

b. One Oregon driver's license in the name of John Murphy, license number 8316797, with the same photograph of Andre Shaw as mentioned above, and a corresponding Social Security Card, number XXX-XX-8750, bearing the name John Murphy. A LEDS check indicated the driver's license number was invalid and did not come back to any individual. A public records search indicated that Social Security account number XXX-XX-8750 belongs to John Murphy, residing at 15 Slater Street, Amsterdam, New York 12010. Murphy also had two prior addresses in Gloversville, NY. Shaw previously lived in Gloversville, NY.

c. One New York driver's license in the name of Brent Moody, license number 325812751, with the same photograph of Andre Shaw as mentioned above. A LEDS check indicated this New York driver's license number was not valid and did not come back to any individual.

d. Four envelopes containing multiple copies of hologram sheets for Ohio, Connecticut, New Jersey, and Pennsylvania. The Ohio holograms were for the Ohio Department of Public Safety. The Connecticut holograms were for the Connecticut Department of Motor Vehicles. The New Jersey holograms were of The Great Seal of the State of New Jersey. The Pennsylvania holograms were for the State of Pennsylvania and contained a list of the counties in Pennsylvania. Further investigation determined the four sets of holograms were the latest security features for each respective state's driver's license card.

e. A Foreign Sovereign Immunities Act Non-Resident National ID card in the name of Joseph-Michael Stanis. The ID card contains a photograph of Andre Shaw and the seal of the United States Department of State.

f. A black bag containing equipment needed to make false identification documents, including one magnetic stripe card reader/writer; approximately 65 blank credit card stock with magnetic encoding stripe; and one USB magnetic stripe reader;

g. A black case with supplies needed to make false identification documents, including approximately 110 blank credit card stock with magnetic encoding stripes; approximately 100 blank credit card stock; eight blank card stock with a microchip embedded in the surface; a stamp with an image of the United States eagle; three State of Oregon security holograms; stamps to create State of Oregon security features; multiple sheets of Rhode Island Motor Vehicles security holograms; and paint brushes, acrylic paint, rubber gloves, and X-acto knife tips;

h. An "AIP" brand manual PVC card cutter and "imagepac" stampmaker; and

i. Three books with titles relating to creating a new identity for privacy and personal freedom, creating a foolproof identity, and little known tactics of identity change professionals.

8. Agents located and seized eight compact discs that were labeled "ORDMV," "Social Security Administration," "OHDMV," "FISA," "US Department of Defense," "NJDMV," "RIDMV," and "NYDMV." Each disc contained one large file that did not have an associated file type. Thus, the discs could not be opened to view their contents.

9. Portland Police Bureau officers found and seized a number of firearms, firearm magazines, and firearm ammunition from Shaw's residence, including the following:

a. Glock model 21, .45 caliber handgun with a modified threaded barrel, S/N BLW363;

- b. Glock model 30, .45 caliber handgun, S/N CYX542;
- c. Glock model 19, nine millimeter handgun, S/N VAA625;
- d. Mossburg 20 gauge shotgun with collapsible stock, S/N UZ6Z639;
- e. Bushmaster XM15-E2S-223, .223 caliber rifle, with a modified barrel and halo sight, S/N L377455;
- f. Taurus PT145, .45 caliber handgun, S/N NYK56462;
- g. Six Glock .45 caliber magazines with .45 caliber ammunition
- h. One Glock 9mm magazine with 9mm ammunition
- i. Two Taurus .45 caliber magazines with .45 caliber ammunition
- j. Four Glock .45 caliber magazines with .45 caliber ammunition
- k. Twenty Magpull .223 caliber magazines with .223 caliber ammunition
- l. Seven Magpull .223 caliber magazines with no ammunition
- m. Two Glock 9mm magazines with 31 rounds of 9mm ammunition
- n. One Glock .45 caliber magazine (15-round extended) with no ammunition;
- o. One bandolier with 26 rounds of 20 gauge shotgun shells.

10. Portland Police officers also found and seized four firearm silencers at Shaw's residence. One was made from a modified fuel filter, and three were made from modified flashlight bodies.

11. On December 28, 2014, Molly Taylor, who is Andre Shaw's girlfriend, and who lives at Shaw's residence, was interviewed. Taylor told investigators that she knew Shaw as Joe Stanis. Taylor said there were three hand guns in the house that belonged to her, however, at the time she could only describe one of them which was a Ruger 9mm hand gun. A Ruger handgun was found in the house.

12. On December 18, 2014, Shaw was arrested by the Portland Police Bureau on an outstanding misdemeanor warrant for failure to appear. He was later charged with identity theft, possession of illegal weapons, and unlawful possession of body armor, in violation of Oregon state law. On December 26, 2014, a Multnomah County grand jury returned an indictment charging Shaw with one count of unlawful possession of short barrel rifle, 4 counts unlawful possession of silencers, 9 counts of ID theft and 9 counts of Forgery I and Criminal Possession of Forgery Device. Shaw remains in custody at the Multnomah County Detention Center on those state charges.

13. On December 23, 2014, I learned that a check of the National Firearms Registration and Transfer Record revealed that neither Andre Eugene Shaw nor Joe Stanis registered any weapons in that record, including silencers or short-barreled rifles.

14. I have reviewed a computerized criminal history for Andre Eugene Shaw. Shaw has been arrested a number of times by police agencies in Fulton County, New York, and Gloversville, New York, for various offenses including second degree criminal trespass, resisting arrest, obstructing governmental administration, second degree harassment, and third degree assault. He was convicted of fifth degree criminal possession of stolen property in New York State in 2002. Non-extraditable misdemeanor bench warrants for failing to appear are presently outstanding for Shaw's arrest in four separate cases in New York State.

### **CONCLUSION**

15. Based on the foregoing information, I have probable cause to believe that Andre Eugene Shaw has violated 18 U.S.C. § 1028(a)(1) by producing a false identification, document; 18 U.S.C. § 1028(a)(3) by knowingly possessing with the intent to use unlawfully five or more false identification documents; and 26 U.S.C. § 5861(d) by possessing unregistered firearm


silencers. I therefore request that the court issue a criminal complaint charging Shaw with those offenses, and a warrant for Shaw's arrest.

16. This affidavit and the requested criminal complaint were reviewed by Assistant United States Attorney Gary Sussman prior to being presented to the court. AUSA Sussman informed me that, in his opinion, the affidavit sets forth adequate probable cause to support the issuance of the requested criminal complaint and arrest warrant.



CHARLES DODSWORTH  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed before me this 30 day of December 2014.



THE HONORABLE JOHN JELDERKS  
United States Magistrate Judge